

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

**FILED**

FEB 12 2015

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

WHO

UNITED STATES OF AMERICA,

V.

**CR 15 096**

ATHANASIOS VOULOUKOS,

~~SEALED~~  
~~BY COURT ORDER~~

DEFENDANT(S).

## INDICTMENT

18 U.S.C. § 1349 - Conspiracy to Commit Mail Fraud;  
18 U.S.C. § 1341 - Mail Fraud;  
18 U.S.C. § 1956(h) - Conspiracy to Commit Money Laundering;  
Criminal Forfeiture - 18 U.S.C. § 981(a)(1)(C) & 982(a)(1) & 28 U.S.C. § 2461(c)

A true bill.



Foreman

Filed in open court this 12<sup>th</sup> day of

FEBRUARY 2015

KAREN L. HOM

Clerk

JOSEPH C. SPERO

Bail, \$

UNITED STATES MAGISTRATE JUDGE

*no bail or writ warrant*

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 Count 1: 18 U.S.C. § 1349 – Conspiracy to Commit Mail Fraud;  
 Counts 2-5: 18 U.S.C. § 1341 – Mail Fraud;  
 Count 6: 18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony

PENALTY: Please see attached.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

**DEFENDANT - U.S.**

ATHANASIOS VOULOUKOS

 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

DISTRICT COURT NUMBER

**CR 15 096**
**PROCEEDING**

Name of Complainant Agency, or Person (&amp; Title, if any)

USPIS

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Robert S. Leach

**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior summons was served on above charges
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT

Bail Amount: None

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

PENALTY SHEET ATTACHMENT

**CR 15 096**

Count One:

18 U.S.C. § 1349 – Conspiracy to Commit Mail Fraud

Maximum Penalties: 20 years imprisonment

\$250,000 fine or not more than the greater of twice the gross gain  
or twice the gross loss (18 U.S.C. § 3571)

3 years supervised release (18 U.S.C. §§ 3583(b) & 3559(a))

\$100 special assessment (18 U.S.C. § 3013)

Counts Two Through Five:

18 U.S.C. § 1341 – Mail Fraud

Maximum Penalties: 20 years imprisonment

\$250,000 fine or not more than the greater of twice the gross gain  
or twice the gross loss (18 U.S.C. § 3571)

3 years supervised release (18 U.S.C. §§ 3583(b) & 3559(a))

\$100 special assessment (18 U.S.C. § 3013)

Count Six:

18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering

Maximum Penalties: 20 years imprisonment

\$500,000 fine or twice the value of the monetary instrument or  
funds involved in the transportation, transmission, or transfer

3 years supervised release (18 U.S.C. §§ 3583(b) & 3559(a))

\$100 special assessment (18 U.S.C. § 3013)

WHO

**FILED**

FEB 12 2015

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**RECEIVED  
FEB 12 2015  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**



FILED

FEB 12 2015

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SEALED  
BY COURT ORDER

WHO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CR 15 096

UNITED STATES OF AMERICA,

Plaintiff,

v.

ATHANASIOS VOULOUKOS,

a/k/a Tom Vouluk,

a/k/a Tom Douluk,

Defendant.

No.

VIOLATIONS: 18 U.S.C. § 1349 – Conspiracy  
to Commit Mail Fraud; 18 U.S.C. § 1341 –  
Mail Fraud; 18 U.S.C. § 1956(h) – Conspiracy  
to Commit Money Laundering; Criminal  
Forfeiture – 18 U.S.C. §§ 981(a)(1)(C) &  
982(a)(1) & 28 U.S.C. § 2461(c)

SAN FRANCISCO VENUE

INDICTMENT

The Grand Jury charges:

Introductory Allegations

At all times relevant to this Indictment:

1. ATHANASIOS VOULOUKOS, a/k/a Tom Vouluk, a/k/a Tom Douluk, resided in Ville  
St-Laurent, Quebec, Canada.

2. Between on or about May 11, 2009, and on or about January 17, 2014, VOULOUKOS  
and others caused the following entities to be formed in Nevada: American Business Network, Inc.;  
Internet Business Listings, Inc.; Info US, Inc.; National Business Network, LLC; On Line Business  
Systems, LLC; Nation Wide Business Network Inc.; Search Engine Technologies Inc.; Internet  
Company Services Inc.; List Your Business Online, Inc.; Internet Listing Solutions Inc.; Business

INDICTMENT

1 Listing Solutions, Inc.; Internet Data Business Services, Inc.; Industry Optimization Systems, Inc.; US  
2 Online Business Solutions; and Data Source Systems Inc. (together, the “Companies”).

3 The Scheme to Defraud

4 3. Beginning at a time unknown to the Grand Jury, but not later than in or about May 2009,  
5 and continuing until in or about June 2014, as part of a scheme, VOULOUKOS and others induced  
6 small businesses, churches, cities, and others in the United States to pay for phony “business listing  
7 optimization,” “business profile optimization,” “online business listing optimization,” or similar services  
8 using false invoices and other deceptive practices. The false invoices instructed the small businesses,  
9 churches, cities, and others in the United States to send payment – usually around \$500 – to a street  
10 address. The street address, in fact, was a UPS or similar mailbox rented by one of the Companies or  
11 another entity involved in the scheme. Thousands of individuals and entities paid on the false invoices.

12 4. As part of the scheme, VOULOUKOS used the following means and methods:

13 a. VOULOUKOS caused others to open multiple United States bank accounts on  
14 behalf of certain Companies and other entities involved in the scheme.

15 b. VOULOUKOS caused others to open multiple mailboxes in various UPS stores,  
16 or similar stores, on behalf of certain Companies and other entities involved in the scheme, including  
17 box number 426 at a UPS store at 182 Howard Street, San Francisco, California 94105, opened in the  
18 name of National Business Network.

19 c. VOULOUKOS instructed, or caused others to instruct, UPS and similar stores  
20 receiving mail on behalf of certain Companies and other entities involved in the scheme to forward the  
21 mail to addresses in Canada or a mail forwarder near the Canadian border.

22 d. VOULOUKOS caused others to call, or receive calls from, small businesses,  
23 churches, cities, and other persons in the United States regarding the fraudulent invoices and falsely  
24 state that the small businesses, churches, cities, or other persons had ordered “business listing  
25 optimization” or similar services and owed the amount on the invoice.

26 e. VOULOUKOS caused the UPS or similar stores to forward checks received from  
27 small businesses, churches, cities, and other persons in payment of the fraudulent invoices to Canada.  
28

f. VOULOUKOS caused others to endorse such checks and deposit such checks in United States bank accounts held by Companies and other entities involved in the scheme.

g. VOULOUKOS wired, or caused others to wire, some of the money deposited in United States bank accounts held by Companies and other entities involved in the scheme to accounts in Canadian banks.

5. Between in or about May 2009 and in or about June 2014, VOULOUKOS and others known and unknown to the Grand Jury, using this false billing scheme, collected more than \$3.2 million from thousands of victims.

COUNT ONE: (18 U.S.C. § 1349 – Conspiracy to Commit Mail Fraud)

6. The factual allegations in Paragraphs 1 through 6 are re-alleged and incorporated by reference.

7. Beginning at a time unknown to the Grand Jury, but not later than in or about May 2009, and continuing until in or about June 2014, in the Northern District of California and elsewhere, the defendant,

ATHANASIOS VOULOUKOS,  
a/k/a Tom Vouluk,  
a/k/a Tom Douluk,

and others known and unknown to the Grand Jury, did knowingly conspire to devise a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by omission and concealment of material facts, and to knowingly cause mail and other matter to be sent and delivered by the Postal Service and private and commercial interstate carriers for the purpose of executing and attempting to execute the scheme, in violation of Title 18, United States Code, Section 1341.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO THROUGH FIVE: (18 U.S.C. § 1341 – Mail Fraud)

8. The factual allegations in Paragraphs 1 through 5 are re-alleged and incorporated by reference.

9. On or about the dates set forth below, in the Northern District of California and elsewhere, the defendant,

ATHANASIOS VOULOUKOS,  
a/k/a Tom Vouluk,  
a/k/a Tom Douluk,

did knowingly, and with intent to defraud, devise and intend to devise a material scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and by omission and concealment of material facts, and, for the purpose of executing such scheme and artifice and attempting to do so, did knowingly place in any post office and authorized depository for mail matter a matter and thing to be sent and delivered by the Postal Service, and deposit and cause to be deposited any matter and thing to be sent and delivered by private and commercial interstate carrier, and take and receive therefrom a matter and thing, and knowingly cause to be delivered by mail and such carrier according to the direction, namely:

COUNT	DATE	ITEM	TO	FROM
TWO	8/25/2011	\$497 payment	182 Howard St, # 426 San Francisco, CA	Hinsdale, IL
THREE	8/26/2011	\$497 payment	182 Howard St, # 426 San Francisco, CA	Ottawa, IL
FOUR	9/1/2011	\$496 payment	182 Howard St, # 426 San Francisco, CA	Butler, PA
FIVE	10/27/2011	\$497 payment	182 Howard St, # 426 San Francisco, CA	Klamath Falls, OR

Each in violation of Title 18, United States Code, Section 1341.

**COUNT SIX:** (18 U.S.C. § 1956(h) – Conspiracy to Commit Money Laundering)

10. The factual allegations in Paragraphs 1 through 9 are re-alleged and incorporated by reference.

11. Beginning at a time unknown to the Grand Jury, but not later than in or about May 2009, and continuing until in or about June 2014, in the Northern District of California and elsewhere, the defendant,

ATHANASIOS VOULOUKOS,  
a/k/a Tom Vouluk,  
a/k/a Tom Douluk,

and others known and unknown to the Grand Jury, did knowingly conspire to commit money laundering, namely to transport, transmit, and transfer monetary instruments and funds from a place in



the United States to and through a place outside the United States to promote the carrying on of mail fraud, as defined in Title 18, United States Code, Section 1956(a)(2)(A).

All in violation of Title 18, United States Code, Section 1956(h).

**FORFEITURE ALLEGATION:** (18 U.S.C. §§ 981(a)(1)(C) & 982(a)(1) & 28 U.S.C. § 2461 – Forfeiture of Fraud Proceeds; Money Laundering Forfeiture)

12. The factual allegations in Paragraphs 1 through 11 are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461.

13. Upon conviction of any of the offenses alleged in Counts One through Five, the defendant,

ATHANASIOS VOULOUKOS,  
a/k/a Tom Vouluk,  
a/k/a Tom Douluk,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any property, real and personal, which constitutes or is derived from proceeds traceable to said violations, including but not limited to a sum of not less than \$3,276,379, representing the amount of proceeds obtained as a result of the offenses alleged in Counts One through Five.

14. Upon conviction of the offense alleged in Count Six, the defendant,

ATHANASIOS VOULOUKOS,  
a/k/a Tom Vouluk,  
a/k/a Tom Douluk,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real and personal, involved in said violations alleged in Count Six.

15. If, as a result of any act or omission of the defendant, any of said property

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;



any and all interest defendant has in any other property shall be forfeited to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461.

All in violation of Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461.

DATED: February 12, 2015

A TRUE BILL

2-12-15

  
FOREPERSON

MELINDA HAAG  
United States Attorney

  
PHILIP A. GUENTERT  
Deputy Chief, Criminal Division

(Approved as to form:   
AUSA ROBERT S. LEACH

**United States District Court  
Northern District of California**

**FILED**

FEB 12 2015

**CRIMINAL COVER SHEET**

**RICHARD W. WIEKING**  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**Instructions:** Effective January 3, 2012, this Criminal Cover Sheet must be completed and submitted, along with the Defendant Information Form, for each new criminal case.

Case Name:

USA v. ATHANASIOS VOULOUKOS

Case Number:

**CR 15 096****WHO**

Total Number of Defendants:

1 ☒2-7 ☐8 or more ☐

Is This Case Under Seal?

Yes ☒No ☐

Does this case involve ONLY charges under 8 U.S.C. § 1325 and/or 1326?

Yes ☐No ☒**SEALED  
BY COURT ORDER**

Venue (Per Crim. L.R. 18-1):

SF ☒ OAK ☐SJ ☐EUR ☐MON ☐

Is any defendant charged with a death-penalty-eligible crime?

Yes ☐No ☒

Assigned AUSA (Lead Attorney):

Robert S. Leach

Is this a RICO Act gang case?

Yes ☐No ☒

Date Submitted:

February 12, 2015

Comments:

Save

Print

Clear Form